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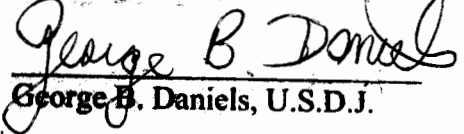
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September 25, 2023

BY ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
40 Foley Square, Room 1105
New York, New York 10007

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: SEP 26 2023

Re: *United States v. Dos Santos, et al.*, 20 Cr. 398 (GBD)

Your Honor:

I represent Mr. Scott Hughes in the above-referenced case. I respectfully request that those confidential portions of his Sentencing Submission, Mr. Hughes's letter to the Court (Exhibit 1), his Medical Reports (Exhibit 3), Veteran and Military Records (Exhibit 4), Mitigation Report (Exhibit 10), Forfeiture letters (Exhibit 11), Excerpts from the Government's June 27, 2023 letter to the Department of Probation (Exhibit 12), and Mr. Hughes's June 7, 2023 letter to the Department of Probation (Exhibit 13) be filed under seal. We email the documents to the Court and the government for your review.

The reason is that the documents contain a host of personal, family, financial, medical, and sensitive information, including biographical data, health records, and personal information, and their disclosure would make this private information public without a vital need for such disclosure and unnecessarily adversely impact Mr. Hughes. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006); and *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995).

I appreciate Your Honor's consideration of this application.

Respectfully,

/s/ Michael Hueston

cc: Assistant United States Attorneys
Cecilia Vogel, Kiersten Fletcher, and Samuel Raymond

Enc.